

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. 3:25-cv-00417-HTW-LGI
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING,
MISSISSIPPI COMMUNITY COLLEGE
BOARD, MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,

Defendants.

DECLARATION OF L.E. JIBOL

Pursuant to 28 U.S.C. § 1746, I, L.E. JiBol, make the following declaration under penalty of perjury:

1. My name is L.E. JiBol. My place of residence is Jackson, Mississippi. I am a native Mississippian, and I have been a resident of Hinds County and the state of Mississippi since 2015. I am a professional counselor and have been since 2014.
2. I am a parent of two children who attend Jackson Public Schools in Jackson, Mississippi. My child J.J. is eight years old, will start third grade this year, and has attended JPS schools for four years. My child N.J. is five years old, will start Kindergarten this year, and has attended JPS schools for two years. I am a white parent of multiracial Black children who are second generation immigrants.

3. Both of my kids are curious, excited students who feel comfortable asking questions and don't censor themselves. Their JPS teachers are helping them to grow to be lifelong learners. Either through the educational instruction or social setting, classroom discussions often focus on increasing awareness or understanding of issues related to race, sex, color, gender identity, sexual orientation or national origin.
4. My children are taught a full spectrum of American history at school, including African American history. J.J. was inspired to see herself in stories of success and bravery when she learned about Florence Joyner, who challenged conventional gender and racial norms as a Black female Olympian. N.J. has learned about Martin Luther King, Jr. in class. Last year J.J.'s teacher gave an assignment for each student to write their own "I have a dream" speech about how they would bring unity and cooperation to the world. It was meaningful and empowering for my child to feel like she could make a change. These assignments are prohibited instruction under Section 3(b) and 3(f) of HB 1193.
5. My children live in a multicultural, multiethnic, multifait household. On any day they may hear four languages spoken at home. Their father is from East Africa and moved to this country as a refugee. The details of their family and home life are the things my children, as with all children, regularly discuss in their elementary school class.
6. In N.J.'s first year at JPS, I came to the classroom to pick him up. The entire class of 3-to-6-year-olds began asking my son why his mom was white but he was Black, and my son's teacher was able to calmly and directly answer their curious questions. It is these daily supports that create a safe learning environment for my children without shutting down their or their classmates' age-appropriate curiosity. Children, especially in this age range, will always ask blunt questions and make frank observations. There is no censoring a three-year-old. The teacher addressing questions about (and perhaps even children asking about) my family's race, color, or national origin is prohibited by Section 3(b) and 3(f) of HB 1193.

7. HB 1197 will prevent my children from speaking about disfavored topics in the classroom setting, and it may prevent them from speaking about these topics during student group events, inviting speakers onto campus to discuss those topics. By censoring educators and prohibiting particular viewpoints and content in the course of instruction, HB 1193 denies my children the right to learn from those viewpoints and content. They will be prohibited from receiving protected speech and activity, including extracurricular speech, now banned by Sections 3(b), 3(f), 3(g) and 3(i).
8. I fear my children, along with their peers and classmates, will self-censor, particularly by stopping themselves from asking questions that they can tell are not only disfavored but are not permitted in their classrooms. All of this discourages and chills my children's speech, and it prevents them from hearing certain prohibited speech, in a way that prevents them from exercising their rights under the First and Fourteenth Amendments.
9. Many provisions of the act are vague, confusing, and inconsistent, and make it difficult for my children and me to differentiate what is prohibited from what is allowed. I am uncertain as to which of their actions will violate the provisions of the act and am concerned that the actions they take as students, or the actions I take as a parent, will later be held against them and that they will be disciplined for saying and doing things that are protected as part of their right to free speech. I am worried that my children could face discipline by speaking or engaging with banned subjects.
10. If any of the forty-one JPS schools cause the school district as a whole to incur two or more specific violations, then all state funds shall be withheld. In a regular period of classroom instruction, I believe that my children's teachers violate the act every day.
11. If my children's school closed, my family is not in a position for either parent to homeschool the children or register for them to attend private school. If the school closed, our only option would be to move out of the state of Mississippi.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 17, 2025


L.E. Jibol